

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,

v.

PARMJIT PARMAR,
a/k/a “Paul Parmar”

Hon. Madeline Cox Arleo

Criminal No. 18-735

UNOPPOSED MOTION TO SEAL

Defendant Parmjit Parmar moves for an Order in the above-captioned matter to seal portions of his Motion to Continue Trial (“Motion to Continue”) and to file a redacted version of the Motion to Continue on the public docket.

Although there is a presumed right of access to judicial records, the right is not absolute. *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598 (1978). While the presumption of access is strong, it can be overcome if the party seeking “to overcome the presumption of access [can] show that the interest in secrecy outweighs the presumption.” *LEAP Sys., Inc. v. MoneyTrax, Inc.*, 638 F.3d 216, 221–22 (3d Cir. 2011). That is, the Third Circuit “permit[s] the sealing of documents when justice so requires.” *Id.* at 221.

Justice requires the sealing of certain limited portions of Mr. Parmar’s Motion to Continue because these portions contain sensitive, non-public information that implicate matters of national security and could jeopardize Mr. Parmar’s safety if publicly disclosed. Accordingly, this confidential, non-public information should be sealed, and Mr. Parmar should be permitted to file the Motion to Continue under seal and a redacted version of the motion on the public docket. *See, e.g., United States v. Sharif*, 2024 WL 3401571, at *1 n.1 (D.N.J. July 12, 2024) (directing the

Clerk of Court to file defendant's motion under seal because it "included sensitive information").

The Government does not oppose Mr. Parmar's Motion to Seal.

PLEASE TAKE NOTICE that a proposed form of Order is submitted with this motion.

Dated: March 12, 2025

Respectfully submitted,

By: s/ Andrew D. Goldstein
Andrew D. Goldstein
Victoria R. Pasculli
Alessandra V. Rafalson
COOLEY LLP
55 Hudson Yards
New York, NY 10001-2157
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
agoldstein@cooley.com
vpasculli@cooley.com
arafalson@cooley.com

John H. Hemann
COOLEY LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2000
Facsimile: (415) 693-2222
jhemann@cooley.com

Anuva V. Ganapathi
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 843-7400
aganapathi@cooley.com

Counsel for Parmjit Parmar